



REPLY TO
ATTENTION OF

DEPARTMENT OF THE ARMY
ST. PAUL DISTRICT, CORPS OF ENGINEERS
180 FIFTH STREET EAST, SUITE 700
ST. PAUL MINNESOTA 55101-1678

Operations
Regulatory (2011-05407-WAB)

DEC 10 2013

Mr. Jim Atkinson
Minnesota Power
30 West Superior Street
Duluth, Minnesota 55802-2093

Dear Mr. Atkinson:

We have completed our review of the proposed purpose and need statement provided via email to the Corps of Engineers on November 22, 2013, for the Great Northern Transmission Line (GNTL) Project. The document was provided as a pre-application submittal to assist in the evaluation of a Department of the Army Clean Water Act (CWA) Section 404 permit application, in the event a Department of the Army permit is needed. This is the first of four concurrence points in an informal merger of the GNTL Project planning process and the CWA Section 404 permit evaluation process. The purpose of incorporating the CWA Section 404 concurrence points into your planning process is to provide a more orderly and timely review, and aid in identifying the least environmentally damaging practicable alternative that meets your project purpose and need.

Project Purpose and Need

Defining the project purpose is critical to the evaluation of any project for compliance with the Section 404(b)(1) Guidelines. The overall project purpose is used for determining practicable alternatives under the 404(b)(1) Guidelines. The overall project purpose should be specific enough to define the proposer's needs, but not so restrictive that it precludes all discussion of alternatives. Corps of Engineers concurrence will indicate the information sufficiently satisfies CWA Section 404 requirements and the project can proceed to the next stage.

Defining the project purpose is the responsibility of the Corps; however, applicant input is considered in making this determination. We would describe the basic project purpose as, "transmitting electricity." The overall project purpose and need statement should define why the proposal must be implemented and be quantified by some means. Your document describes the overall project purpose as:

"To efficiently provide Minnesota Power customers and the region with clean, emission-free energy that will

- (a) help meet the region's growing energy demands,
- (b) advance Minnesota Power's *EnergyForward* strategy of increasing its renewable portfolio,

- (c) strengthening system reliability, and
- (d) fulfill Minnesota Power's obligations under its power purchase agreements with Manitoba Hydro,

all in a manner that is consistent with Minnesota Power's commitment to making a positive impact on communities."

The Corps concurs with your overall project purpose statement and will incorporate it into the permit evaluation process. The overall project purpose is used to evaluate the scope of the alternatives analysis in the subsequent permit evaluation process.

Array of Alternatives and Alternative Carried Forward

The next concurrence point in our informal process involves an initial screening of alternatives and determining which alternatives will be carried forward for further analysis. At that stage, the Corps should be asked for a determination whether the range of alternatives evaluated would satisfy CWA Section 404 regulatory requirements and for concurrence with the dismissal of alternatives. The alternatives analysis should evaluate all the environmental factors for each alternative considered.

The U.S. Department of Energy has the lead Federal role in evaluating the route of the transmission line and its impact to the environment under NEPA. The Corps will defer to the Department of Energy's identification and analysis of route alternatives, evaluation of the selected route, and will participate in that review as a cooperating agency. The Corps will focus our review on the 404(b)(1) evaluation of alternatives and minimization efforts where a discharge of fill into waters of the U.S. would occur, and any secondary aquatic resource impacts associated with those direct impacts.

If you have any questions, please contact Bill Baer in our Bemidji Regulatory field office at (218) 444-6381. In any correspondence or inquiries, please refer to the Regulatory number shown above.

Sincerely,



Tamara E. Cameron
Chief, Regulatory Branch

Cf: Julie Smith, U.S. DOE
Lydia Nelson, HDR
Michelle Bissonette, HDR